

SBA SHIPYARD SUPERFUND SITE
JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA
CERCLIS#: LAD008434185; INFORMATION REQUEST PURSUANT TO
CERCLA SECTION 104(e) U.S.C. §9604(e)

Higman Service Corporation responds to the May 15, 2015, information request from the United States Environmental Protection Agency as follows:

Higman Barge Lines, Inc., predecessor of Higman Service Corporation, responded regarding the alleged disposal of waste at the SBA Shipyard Superfund Site (SBA Site) a number of years ago. Higman Barges Lines, Inc. was a member of SSIC Remediation, LLC, which was formed by certain barge owners voluntarily to assist in the Interim Measures/Removal Action at the SBA site. Enclosed is correspondence dated December 12, 2002, with the attached December 9, 2002 Order and Agreement regarding the Interim Measures/Removal Action at the SBA site. The scope of work was completed entitling the members of SSIC, including Higman Barge Lines, Inc., to the protections provided in the Order and Agreement of December 9, 2002.

Further enclosed is a copy of a letter of September 15, 2005, to Mr. Gene Keepper of the Environmental Protection Agency responding to the July 7, 2005, Notification as Co-generator and Request Response for Investigation and Remediation Activities. The letter states that Higman was and is not liable as a responsible party because of the crude oil exclusion, 42 U.S.C. §9601(14), and because Higman is a beneficiary of the Order and Agreement for Interim Measures/Removal action.

With respect to the particular questions in the May 15, 2015, Response to Information Request, Higman responds:

GENERAL INFORMATION CONCERNING RESPONDENT

1. Provide the full legal name and mailing address of the respondent.

Higman Service Corporation as Successor to Higman Barge Lines, Inc.
1980 Post Oak Boulevard
Suite 1101
Houston, Texas 77056
(713) 552-1101

2. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted within the preparation of the answer.

Kyle Shaw
Higman Service Corporation as Successor to Higman Barge Lines, Inc.
1980 Post Oak Boulevard
Suite 1101

Houston, Texas 77056
(713) 552-1101

Edward F. LeBreton, III
Fowler Rodriguez
400 Poydras Street, 30th Floor
New Orleans, Louisiana 70130
(504) 523-2600

3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.

Higman Service Corporation designates the following individual for all future correspondence concerning this Site:

Edward F. LeBreton, III
Fowler Rodriguez
400 Poydras Street, 30th Floor
New Orleans, Louisiana 70130
(504) 523-2600
lebreton@frfirm.com

4. If Respondent is a business, please give a brief description of the nature of the business.

Higman Barge Lines, Inc., predecessor of Higman Service Corporation, operated tank barges and tugs on inland waterways.

REQUESTS FOR DOCUMENTS

1. Please identify any dealings or transactions you have or had with SBA Shipyards, Inc., Louis Smailhall, Suzanne Smailhall, LEEVAC Shipyards, Inc., n/k/a Bunge Street Properties, LLC, and LEEVAC Industries, LLC n/k/s LEEVAC Shipyards Jennings, LLC. Please provide a brief description of the nature of those dealings or transactions and the timeframes during which those dealings and transactions occurred.
 - a. Specifically, provide dates of when you sent or moved something to the Site and the name and contact information of the person who made such arrangements.

Higman Barge Lines, Inc., predecessor to Higman Service Corporation, brought certain barges to SBA Shipyards, Inc. that had carried crude oil and were to be cleaned. Higman Service Corporation itself has no records of these barges. Attached to the enclosed letter of September 15, 2005, is a two page spreadsheet prepared on behalf of SBA Shipyards that purported to list Higman barges that were cleaned at the yard. The basis of the list purportedly was records of marine chemists who examined the barges following cleaning.

Higman understands, but does not know of its own knowledge, that LEEVAC Shipyards, Inc. leased land adjacent to SBA Shipyards, Inc. for its own shipyard operations. Higman Barge Lines, Inc. brought no barges to LEEVAC Shipyards, Inc. for the purpose of being cleaned or the removal of waste.

2. Please provide any and all documents in your possession that are related to the dealings and transactions detailed in Question 1 above.

See answer to request No. 1.

3. If any of the dealings or transactions described involve hazardous materials, please include a detailed listing of such materials, the materials data safety sheet, dates of transaction, and any quantity associated with those materials.

The dealings of Higman Barge Lines, Inc., predecessor the Higman Service Corporation, with SBA Shipyard, Inc. involved only crude oil, which is not defined as a hazardous material.

4. Please describe in detail any involvement you had with the 2002 RCRA Interim Measures/Removal Action (IM/RA), including, but not limited to, a listing of the parties involved in the IM/RA.

Higman Barge Lines, Inc., predecessor to Higman Service Corporation, was a member of SSIC, which assisted in the Interim Measures/Removal Action at the SBA site. Higman Barge Lines, Inc. was not the manager of SSIC and refers questions regarding SSIC and the 2002 RCRA Interim Measures/Removal Action to SSIC and its former managers.

5. Please provide the names, title, and contract information of anyone, including, but not limited to, employees, who may possess knowledge and information regarding this Site and/or your own business operations.

Higman Service Corporation, successor to Higman Barge Lines, Inc., has no knowledge of its own regarding the SBA site or the prior cleanup activities there.

6. Identify all of the individuals who currently have and those who have had responsibility for the Respondent's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of the Respondent's wastes). This information shall include, but not be limited to, the following:
 - a. Each individual's job title and duties (including the dates performing those duties),
 - b. The supervisors for such duties,
 - c. The current position or the date of the individual's resignation, and

- d. The nature of the information possessed by such individuals concerning the Respondent's waste management.
- e. The contact information of the individual.

Higman Barge Lines, Inc. did not dispose, treat, store, recycle or sell waste and did not have an individual in charge of environmental matters. Cleaning of barges owned by Higman Barge Lines, Inc. was overseen by Preston Shufford, c/o Higman Barge Service, 1980 Post Oak Boulevard, Suite 1101, Houston, Texas 77056. When it was active, Higman Barge Lines, Inc. contracted with barge cleaning facilities to dispose of any materials that may be generated in the barge cleaning.

7. Does the Respondent's company or business have a permit(s) issued under RCRA? If so, provide a copy(ies) of the permit(s).

None.

8. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

None.

9. Does the Respondent's company or business have, or has it ever had, a permit(s) under the hazardous waste laws of the State? If so, provide a copy(ies) of the permit(s).

None.

10. Does the Respondent's company or business have an EPA Identification Number, or an identification number supplied by the State? If so, supply any such identification number(s).

None.

11. Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.

None.

12. Provide copies of all documents created or kept by the Respondent related to the nature, quantity, or source of the materials taken to the Site.

None.

13. If barges were placed or disposed at the Site, provide the following information:

- a. Where they were placed or disposed, and
- b. Their condition when placed or disposed.

Higman Service Corporation, successor to Higman Barge Lines, Inc. does not have this information.

14. Identify other individuals and entities that the Respondent has reason to believe may have taken or sent materials to the Site. Of these individuals and entities, specify which were observed by the Respondent at the Site and indicate when those observations were made. Provide all of the information known by the Respondent regarding the customers of these entities or individuals.

See response to request No. 4 above.

June 10, 2015

Higman Service Corporation as Successor to
Higman Barge Lines, Inc.

By: Edward F. LeBreton, III
Fowler Rodriguez
400 Poydras Street, 30th Floor
New Orleans, Louisiana 70130
(504) 523-2600
lebreton@frfirm.com